

Brookstone Law, PLC  
c/o Scott Bernard, Counsel  
1113 Range Ave., #110-109  
Denham Springs, Louisiana 70726

**Suit at Common-Law  
With Common-Law Jury Demand**

Gianna Miceli

CASE #: \_\_\_\_\_

Versus

Kevin Farquharson, and  
Gregory Tony

**1. Parties and Capacity of**

**Gianna Miceli**, the aggrieved bringing this suit at common-law, who is of the people, with private and inalienable rights, and not bound by commercial, statutory, and/or legal authority.

**Kevin Farquharson**, the alleged causer of the grievance(s) named in this suit at common-law, who is of the people, with inalienable rights, who does serve as a Deputy Sheriff for and within Broward County, State of Florida, being bound by the office held to commercial, statutory, and/or legal authority.

**Gregory Tony**, the alleged causer of the grievance(s) named in this suit at common-law, who is of the people, with inalienable rights, who does serve as a Sheriff for and within Broward County, State of Florida, being bound by the office held to commercial, statutory, and/or legal authority.

## **2. Introduction to Claim and Background**

This Suit at Common-Law is brought against Kevin Farquharson and Gregory Tony, in their capacity as being of the people, bearing unlimited liability and without protections under qualified immunity, for conspiring to use publicly-funded manpower, military-grade equipment, weaponry, and intimidation to carry out my unlawful arrest and false imprisonment.

The collective conduct of Kevin Farquharson and Gregory Tony does establish, under the standard of reasonable-articulable suspicion, the triable allegations of breach of duty, breach of sworn oath, abuse of authority, gross negligence, theft of property, deprivation of rights under the color of law, conspiracy, failure to uphold the law, treason, human trafficking, and crimes against humanity, resulting in the violation of my protections under the Bill of Rights and constitution, and the causing of undue harm and detriment to me.

## **3. Facts**

On 2025-02-09, at approximately 21:00, I was traveling in a 2021 Jeep Wrangler Rubicon, bearing a private (non-government issued) plate in a conspicuous location on the rear bumper, when Kevin Farquharson activated the emergency lights on his sheriff's vehicle owned by the Broward County Sheriff's Department (BSO), followed behind me, and arrested my locomotion.

Kevin Farquharson approached my car window, which I lowered slightly, and demanded my license and registration.

I informed Kevin Farquharson the automobile I was traveling in was private, and I had neither a driver's license or registration as both were voluntarily surrendered.

Kevin Farquharson walked back to his vehicle, then reapproached my window while speaking with a dispatcher with the Broward County Sheriff's Department informing of my no license and registration.

The dispatcher announced, "Be advised - Sovereign Citizen".

Kevin Farquharson radioed for back-up and multiple deputy sheriffs arrived on scene shortly thereafter.

Kevin Farquharson noticed a handgun in my purse and repeatedly advised me not to reach for the weapon.

Kevin Farquharson searched my automobile without my consent, confiscated my private (non-government issued) plate, my private (non-government issued) identification, my two privately-owned handguns, and my privately-owned automobile.

I was placed in hand-cuffs, transported to a holding facility, and made to be imprisoned for alleged criminal conduct.

Upon information received, it was learned that the person of GIANNA MICELI was charged with: (2) counts of unlawful carry of concealed weapon, driving while license suspended-first offense, failed to register motor vehicle, (2) counts resist officer-obstruct without violence, unlawful speed posted state/intersect, and failed to provide proof of liability security.

Approximately 24 hours later I was released from said holding facility after posting a \$1,500 (fifteen hundred dollar) bond.

#### **4. Establishment of Allegations**

Kevin Farquharson does serve as a Deputy Sheriff for BSO who is bound, under the penalty of law, to uphold the constitution, inclusive of the Bill of Rights, and perform the prescribed duty(s) at all times with honesty, integrity, and professionalism, without a showing of bias, partiality, regard of persons, or reckless disregard of a duty and consequences to another party.

Gregory Tony does serve as Sheriff for BSO, with direct command over Kevin Farquharson, who is bound, under the penalty of law, to uphold the constitution, inclusive of the Bill of Rights, and perform the prescribed duty(s) at all times with honesty, integrity, and professionalism, without a showing of bias, partiality, regard of persons, or reckless disregard of a duty and consequences to another party.

Kevin Farquharson and Gregory Tony are men serving as public law enforcement officials who are devoid of authority to regulate anyone who is of the people, endowed by our creator with inalienable rights, and not bound by commercial, statutory, or legal authority.

Kevin Farquharson and Gregory Tony are men serving as public law enforcement officials who are devoid of authority to regulate private (non-registered) automobiles owned by anyone who is of the people, endowed by our creator with inalienable rights, and not bound by commercial, statutory, or legal authority.

Kevin Farquharson and Gregory Tony are men serving as public law enforcement officials who are devoid of authority to confiscate and/or seize private property, of any kind, owned by anyone who is of the people, endowed by our creator with inalienable rights, and not bound by commercial, statutory, or legal authority.

Kevin Farquharson and Gregory Tony are men serving as public law enforcement officials who are devoid of authority to seize handguns and abridge the right to keep and bear arms, a right that is not subject to infringement or alteration by subsequent legislation.

Kevin Farquharson and Gregory Tony are men serving as public law enforcement officials who are devoid of authority to circumvent the rights of anyone who is of the people, endowed by our creator with inalienable rights, and not bound by commercial, statutory, or legal authority.

Accordingly, upon consideration of the herein-above facts Kevin Farquharson and Gregory Tony have jointly and severally established, under the standard of reasonable-articulable suspicion, the triable allegations of:

- **Breach of Duty of Care** by failing to find the truth prior to ordering the external enforcement function of a false arrest, imprisonment, and seizure of lawfully owned private property that is not bound by commercial, statutory, or legal authority.
- **Breach of Sworn Oath** by failing to uphold the constitution and laws of this nation, and failure to honor one's inherent right to due process, equal protection under the law, owning private property, and the prohibition of involuntary servitude.
- **Abuse of Authority** by engaging in conduct not qualified by the scope and authority of the office being held, with a voluntary misrepresentation intended to create the perception that said conduct is qualified by the office being held.
- **Gross Negligence** by voluntarily failing to exercise slight diligence or care, and consciously engaging in an act or omission in reckless disregard of a duty and the consequences to another party.
- **Theft of Property** by making a contrary determination of law and carrying out the external enforcement function of a false arrest and seizure of lawfully owned private property that is not bound by commercial, statutory, or legal authority.
- **Deprivation of Rights Under the Color of Law** by engaging in conduct not qualified by the office being held, under the guise of official and lawful capacity, with intent to extract property or compel performance.
- **Conspiracy to Commit Deprivation of Rights** by engaging in conversation or communication with another to deprive the rights of any member of the people who is endowed with inalienable rights.

- **Failure to Uphold the Law** by setting aside priority evidence and failing to act lawfully by carrying out the external enforcement function of a false arrest and seizure of property not regulatable under the scope and authority of the office(s) being held.
- **Misrepresentation** by voluntarily misrepresenting improper or unlawful conduct as being qualified by the scope and authority of the office(s) being held.
- **Unlawful Adjudication** by knowingly setting aside material facts and making an unauthorized contrary determination of law to reach a conclusion of law that the automobile and property named herein-above was declared (by consent of the owner) to be public property, subject to commercial, statutory, and/or legal authority, as evidenced by a current registration and/or up-to-date records held within a county or state agency.
- **Defamation of Character** by publicly speaking and displaying defaming information and content regarding me.
- **Treason** by knowingly and willingly aiding, supporting, defending, and employing a system of external enforcement functions, grounded in administrative procedures, that circumvents the Bill of Rights and abridges the inalienable rights of the American people.
- **Human Trafficking**, by forcibly detaining, transporting, and restraining me with intent to exploit me and realize a monetary gain and/or benefit of a particular kind, type, variety, or nature.
- **Crimes Against Humanity**, by the enforcement of a commercial system of administrative procedures with the intent of subjecting me to involuntary servitude of a physical and/or economic nature, resulting in undue hardship, detriment, loss, pain, mental anguish, and suffering.

## 5. Conclusion

According to the testimony of multiple whistle-blowers within the BSO, Gregory Tony and his executive staff willingly institute officer training procedures intended to dissuade the public from exerting constitutional protections, including, but not limited to, the use of force and intimidation, summoning excessive back-up for non-aggressive behavior, labeling individuals as "Sovereign Citizens", charge stacking, physical restraint - when no weapon or danger is present, arrest, and imprisonment for otherwise non-arrestable conduct.

The actions of Gregory Tony and his executive staff are found to be without justification as liability for misconduct is never excused under a defense of following the orders of a superior officer and/or a legislative body such as the Florida State Senate.

Kevin Farquharson willingly engages in these intimidation tactics, and his conduct is found to be without justification as liability for misconduct is never excused under a defense of following the orders of a superior officer.

As such, any claim of ignorance of the supreme law of our nation (Constitution/Bill of Rights) will never serve as a mountable defense.

In lieu of finding the truth and exercising duty of care to avert potential harm to an innocent woman, Kevin Farquharson and Gregory Tony did engage in conversation or communication to organize and plan the external enforcement function of a false arrest, imprisonment, and seizure of privately-owned property not regulatable under commercial, statutory, and/or legal authority.

Kevin Farquharson and Gregory Tony swore under oath to uphold the constitution and laws of the United States, an oath which they openly violate under the guise of public safety.

Kevin Farquharson and Gregory Tony did seize lawfully owned handguns from me, thereby abridging my right to keep and bear arms. Contrary to the unsound ideology of Kevin Farquharson and Gregory Tony, the 2nd Amendment to the Bill of Rights is not a privilege, but a right that may never be infringed or altered by any subsequent legislative act(s) that were not in effect at the time of the Amendment's adoption. (New York State Rifle & Pistol Association v. Bruen).

By a standard of average intelligence and sound reasoning, the conduct and practices of Kevin Farquharson and Gregory Tony indicate they lack the integrity, moral fortitude, and mental faculties required of anyone serving the public interest.

By a standard of average intelligence and sound reasoning, the conduct and practices of Kevin Farquharson and Gregory Tony indicate an abhorrent disdain for the protections enumerated within the Bill of Rights.

By a standard of average intelligence and sound reasoning, the conduct and practices of Kevin Farquharson and Gregory Tony indicate they favor expanding the scope and authority of the office(s) held in order to diminish one's desire to invoke the protections enumerated within the Bill of Rights.

Under the standard of reasonable-articulable suspicion the allegations of unlawful conduct, violation of private rights, conspiracy, and others enumerated herein, are properly established against Kevin Farquharson and Gregory Tony.

Kevin Farquharson and Gregory Tony are afforded no qualified immunity, as such immunity only serves to shield a "Public Official" who engages in conduct that is qualified under the constitution and by the scope and authority of the office being held.

Qualified Immunity may never serve to shield the conduct of Kevin Farquharson and Gregory Tony from a comprehensive investigation and the finding of facts by a jury.

The conduct in question and the allegations established under the standard of reasonable-articulable suspicion are lodged against Kevin Farquharson and Gregory Tony, men who are one of the people, bearing unlimited liability and without protections under qualified immunity.

WHEREFORE, the allegations against Kevin Farquharson and Gregory Tony are established as being triable before a jury that will render a decision upon the finding of facts.

## **6. Declaration of Authority to Bring this Claim**

We hold these truths to be self-evident, that all men are created equal, that they are endowed by their Creator with certain unalienable Rights, that among these are Life, Liberty, and the pursuit of Happiness. — That to secure these rights, Governments are instituted among Men, deriving their just powers from the consent of the governed, — That whenever any Form of Government becomes destructive of these ends, it is the Right of the People to alter or to abolish it, and to institute new Government, laying its foundation on such principles and organizing its powers in such form, as to them shall seem most likely to affect their Safety and Happiness. (*Declaration of Independence — July 4, 1776*).

LET IT BE KNOWN, that Kevin Farquharson and Gregory Tony are operating as government officials whose conduct is alleged to be "destructive" to the rights of the people.

The bringing forth of this suit at common-law will serve as the lawful commencement of abolishing the ability of Kevin Farquharson and Gregory Tony to continue occupying any position within any government agency.

## **7. Jury Demand**

As the members of a common-law jury will respectively bear the cost of their decisions, they form the only body in this nation that can administer pure, blind, equal, and unadulterated justice.

WHEREFORE, demand is hereby made for this claim to be judged by a jury in accordance with the 7<sup>th</sup> Amendment to the Bill of Rights, and no waiver of jury trial will be given by me or inferred by the court on my behalf from acquiescence, unconscionable acts, omissions, and the like.

## 8. Advisory of Non-Consent

The courts in the United States of America have a documented history of resisting suits at common-law, beginning with the clerk of court who, upon receipt of said suit, will present a CIVIL COMPLAINT form with a verbal directive to fill out said form. As no other options are presented by the clerk, one is persuaded to fill out said CIVIL COMPLAINT form, thereby creating the perception of consent for classifying the suit at common-law as a Civil Action.

Subsequently, the suit (now classified a Civil Action) is moved under administrative jurisdiction and the court invokes its perceived authority to entertain pretrial magistrate reports and motion(s) to dismiss, all of which hinge on the Federal Rules of Civil Procedure, statutes, and the like.

However, as the Federal Rules of Civil Procedure and statutes employed by administrative judges were not in effect at the time the 7<sup>th</sup> Amendment was adopted, they are not in line with our nation's history and are wholly inapplicable within suits at common-law. (New York State Rifle & Pistol Association v. Bruen).

Furthermore, the 7<sup>th</sup> Amendment to the Bill of Rights guarantees the right of a jury trial in suits at common-law, and controlling authorities mandate that a jury must be presented with all the evidence in order to "**find the facts.**" (SEC V. Jarkey; 7<sup>th</sup> Amendment to the Bill of Rights).

As such, the entertainment of pretrial motions and Magistrate recommendations, and the granting thereof by any judge, would establish an impeachable offense and the triable allegation of treason for willingly aiding, supporting, defending, and employing a system of administrative procedures that circumvents the Bill of Rights and wars against the inalienable rights of the American people.

Accordingly, let it be known and understood that NO CONSENT is given by me for this suit being classified as a Civil Action, moved under administrative jurisdiction, assigned to a Magistrate Judge (or any other non-Article III official), and no inference by unconscionable act(s), omission(s), tacit agreement(s), or acquiescence will be deemed as justification for the court to overshadow my clear and unambiguous declaration of NO CONSENT.

It is clearly stated that this is a Suit at Common-Law with a common-law jury demand. As such, no motion(s) or report(s) based on civil procedures, statutes, or district court decisions will be acknowledged by me. Accordingly, any nonresponse thereto may in no way infer my acquiescence to said motion(s) or report(s), as it is not possible to acquiesce into terms that have no standing or jurisdiction, and are wholly inapplicable with no lawful force and effect.

WHEREFORE, demand is made to assign this suit at common-law to an Article III judge who will, without undue delay, move the matter toward a trial to be held on the earliest possible day and time.

#### **9. Damages Sought**

Upon a finding that the allegations named herein are established as truth and facts, I am seeking the following recompense and damages:

- The return of my automobile, Identification, Private Plate, and two handguns.
- Damages from Kevin Farquharson: \$5,000,000 (five million dollars), plus costs, in addition to any other damages, sanctions, and the like, that the jury may deem appropriate upon the finding of facts.
- Damages from Gregory Tony: \$5,000,000 (five million dollars), plus costs, in addition to any other damages, sanctions, and the like, that the jury may deem appropriate upon the finding of facts.

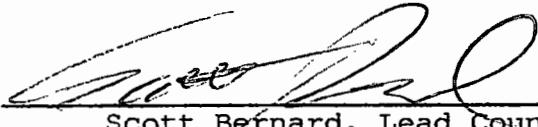
#### **10. Declaration of Counsel**

I hereby choose Scott Bernard, lead counsel for Brookstone Law, PLC, as my counsel of choice to assist me as I see fit.

I authorize all correspondence and communications to be mailed to:  
Scott Bernard, Brookstone Law, PLC, 1113 Range Avenue, #110-109, Denham Springs, Louisiana 70726.

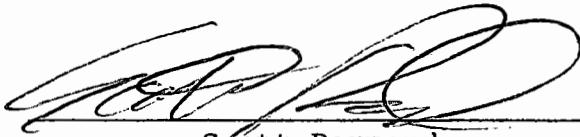
Sealed this 12<sup>th</sup> day of February in the year of our Lord 2025.

  
\_\_\_\_\_  
Gianna Miceli

  
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Scott Bernard, Lead Counsel  
Brookstone Law, PLC  
1113 Range Ave., #110-109  
Denham Springs, Louisiana 70726

SERVICE: I, the undersigned third-party, hereby affirm that a copy of the foregoing was sent to:

- Kevin Farquharson and Gregory Tony  
2601 W. Broward Blvd.  
Fort Lauderdale, Florida 33312

  
\_\_\_\_\_  
Scott Bernard

**Brookstone Law, PLC**  
*A Common-Law Remedy for Uncommon Tyranny*

*1113 S. Range Ave. – Suite 110-109 – Denham Springs, LA 70726*

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February 12, 2025

To all respondents:

- ***Kevin Farquharson and Gregory Tony  
2601 W. Broward Blvd.  
Fort Lauderdale, Florida 33312***

You are named as the alleged cause of grievance(s) in a suit at common-law, and are hereby served a true and correct copy thereof.

Said suit at common-law is being brought forth in a proper venue located in the City of Fort Lauderdale, within the territorial boundaries of Florida.

The place and location of said venue is commonly known as the United States District Court, located at: ***299 E. Broward Blvd., Fort Lauderdale, Florida 33301.***

For additional case information, you may contact the clerk of court:

By Mail: ***Clerk, U.S. Dist. Court  
299 E. Broward Blvd., #108  
Fort Lauderdale, Florida 33301.***

By Phone: ***(954) 769-5400***

Thank you for your kind attention.

Regards,



Scott Bernard  
Assistance of Counsel  
for and with Gianna Miceli

\*\*\* Notice to Court Clerk \*\*\*

Courts in the United States of America have a documented history of resisting suits at common-law, beginning with the clerk of court who, upon receipt of said suit, will present a CIVIL COMPLAINT form with a verbal directive to fill out said form.

With the completed CIVIL COMPLAINT form in hand, *the clerk will enter the suit at common-law and assign a case number with the letters "CV" imbedded to indicate the suit is a Civil Action.*

Subsequently, based on the suit being entered as a Civil Action, the court will invoke its perceived authority to entertain pretrial magistrate reports and motion(s) to dismiss, all of which hinge on the Federal Rules of Civil Procedure, statutes, and the like.

**THEREFORE, please take notice that:**

- This is a suit at common-law, not a Civil Action.
- I offer no consent to this suit at common-law being classified as a Civil Action through inferring consent by my unconscionable acts, omissions, and the like.
- This suit at common-law contains a common-law jury demand pursuant to the 7<sup>th</sup> Amendment to the Bill of Rights.
- This suit at common-law may not be assigned a case number with the letters "CV" imbedded therein.
- This suit at common-law may not be assigned to a magistrate.
- This suit at common-law must be assigned to an Article III judge.
- I will not tender a fee for filing this suit at common-law, as all people are guaranteed access to a free and fair judiciary despite economic status.